

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10080-NMG
)	
GAMAL ABDELAZIZ, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE OPPOSITION TO DEFENDANTS’
POST-TRIAL MOTIONS EXCEEDING PAGE LIMIT AND UNDER SEAL**

The government respectfully moves for leave of Court to file an omnibus opposition to the defendants’ post-trial motions that exceeds the page limit set by the Local Rules, and to file its opposition partially under seal insofar as it discusses sealed jury selection transcripts.

The defendants Gamal Abdelaziz and John Wilson were convicted on all counts following a four-week trial. The defendants have filed 67 pages of briefing in support of their post-trial motions pursuant to Fed. R. Crim. P. 29 and 33. *See* Dkts. 2330, 2342, 2351, 2412. These motions, in turn, incorporate by reference more than 50 other defense motions and hundreds of pages of trial transcripts. The government respectfully submits that filing one omnibus brief is the most efficient option for the government to oppose, and the Court to consider, the defendants’ post-trial motions. Further, given the extensive trial record and length of the defendants’ briefing, the government respectfully submits that additional briefing exceeding the 20-page limit under the Local Rules is necessary to adequately summarize the evidence and address the defendants’ legal arguments, and will therefore assist the Court in resolving the defendants’ motions. Accordingly, the government requests leave of Court to file an omnibus opposition to the defendants’ post-trial motions of no more than 57 pages, 10 fewer pages than the defendants have filed.

Further, the defendants’ motion for a new trial pursuant to Rule 33 contends that the Court “erred in overruling . . . [their] objections with respect to jury selection,” generally citing the three days of jury selection transcripts. *See* Dkt. 2412 at 9. The Court sealed the transcripts of jury selection on September 9 and 10, 2021, which involved individual *voir dire*. *See* Dkt. 2250 at 8 (denying media “intervenors’ motion for access to transcripts and questionnaires”). Because it is necessary for the government to discuss the sealed jury selection transcripts to address the defendants’ objections while preserving the privacy interests of jurors, the government respectfully requests leave of Court to file its opposition partially under seal and to redact any portions that discuss sealed jury selection transcripts or individual jurors.

CONCLUSION

Accordingly, the government respectfully requests leave of Court to file an omnibus opposition to the defendants’ post-trial motions of no more than 57 pages, and to file that opposition partially under seal insofar as it discusses sealed jury selection transcripts or individual jurors. The government will file a redacted version on the public docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Ian J. Stearns
IAN J. STEARNS
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